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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

J.G.

Plaintiff,

v.

TYLER JONES a/k/a TYLER JOHN JONES,

Defendant.

Case Action No. 24-cv-08232

**DECLARATION OF J.G.**

I, J.G., being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request to proceed under the pseudonym “J.G.”

2. I make this request in a desperate attempt to preserve what remaining privacy I have left after Defendant TYLER JONES a/k/a TYLER JOHN JONES (“Jones” or “Defendant”) asked to borrow my phone, rummaged through it for my intimate content, sent my images to himself, and then posted them online on a near daily basis – along with my name, employer, hobbies, age, height, profession, and more – for over a year.

3. The photographs Jones stole did not belong to him and were never intended to be seen by him; they were on my phone and belonged to me.

4. My only mistake was allowing a close friend's boyfriend to borrow my phone when he said his battery was low. I knew and trusted them both. I was completely unaware that I had invited someone so depraved and with such disregard for my safety and the safety of others into my home.

5. The Complaint touches upon Jones' prior guilty plea for recording and posting two women and one minor without their permission or consent – something I only came to learn when I discovered my own images online. It also demonstrates that even after accepting that guilty plea he continued to post their content online and share videos privately with third parties who inquired. Concerning my content, the Complaint demonstrates Jones' persistence in posting my naked body online even when his romantic partner obviously said something to him that should have let him know I was aware of his actions.

6. Jones clearly has no respect for the judicial system or fear of being caught and punished for his actions. He has boasted that his prior guilty plea had little impact on his life and apparently feels that he can continue to violate unsuspecting women with no real repercussions.

7. Conversely, Defendant's acts have devastated me. I used to be trusting and endlessly optimistic and now, more often than not, I can only see and imagine the worst of people.

8. Not only did Jones show me how vile a person can be but so too did all the other people on these online boards – the people posting hundreds of other naked women who, just like me, have or had no idea their images are being shared online. These are people who begged Jones to share more images of me, who asked for more information about me, and who have contacted me online and on my cellphone. These are people who – just like Jones – seem like perfectly normal or even kind individuals but who are actually monsters.

9. I sold my car for fear that it was too identifiable. I have trouble changing at the gym for fear that someone may photograph me undressing. I always feel like people are watching me. Every strange look leads me to believe that person has seen the images that Jones posted and is trying to recall why I look so familiar.

10. I have had my house swept for hidden cameras. I once confronted a man in a grocery store who I felt was recording me. I look at every incoming phone call from an unknown number and weigh my desire to further my career as a photographer against the real possibility that it is just another pervert who has seen my naked body online and wants to hear my voice. Every new client makes me wonder whether I am about to walk into a trap.

11. What Defendant has done to me has changed the way I define myself forever.

12. Forcing me to put my name on this lawsuit and link myself to Defendant's actions more than he has already done would gut me. While my attorneys and I continue to work to scrub my name, face, and body from the underbelly of the internet week after week, I would have no such option with a publicly filed lawsuit.

13. Worse yet, the legions of individuals who enjoyed objectifying me online may very well find the lawsuit, link it to my content, and give people even more reason to share me. For some of these people, the harm they are causing to unsuspecting women is half the reason they are doing it.

14. Additionally, Defendant Jones is very much aware of how deeply humiliating and painful this ordeal has been for me. If my name is linked to the docket, I have a very real fear that it will become a weapon which he can use to force me into abandoning this lawsuit.

15. I want justice against Jones, but I also want to do everything in my power to make sure his actions do not define me. I should not be forced to walk into every interview,

networking event, friendship with the fear that someone searched me on Google and now knows all of the traumas Defendant forced me to experience. If made to proceed using my true name I likely would not bring this lawsuit at all and Defendant very may well continue doing this to me and others, emboldened by the catch-22 his violations create.

16. I request that the court allow me to utilize my initials in this action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 2, 2024

/s/ J.G.  
J.G.